

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STEELWORKERS OF AMERICA,	)	
AFL-CIO/CLC,	)	
	)	
Plaintiff,	)	Civil Action No. 04-12489
	)	
v.	)	
	)	
Pliant Corporation,	)	
	)	
Defendant.	)	
_____	)	

**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND THE FILING DEADLINE FOR  
THE PLAINTIFF'S OPPOSITION TO THE DEFENDANT'S MOTION TO DISMISS**

The Plaintiff, United Steelworkers of America, respectfully requests that this Court grant the Plaintiff's Motion to Extend the Filing Deadline for the Plaintiff's Opposition to the Defendant's Motion to Dismiss specified in Judge Young's Order of February 28, 2005 for thirty (30) days. The current filing deadline is March 30, 2005; if granted, the new filing deadline would be April 29, 2005.

In support of its Motion, the Plaintiff states as follows:

1. On February 24, 2005, the parties agreed in principal to a settlement in the above-captioned matter.
2. Subsequent to this agreement, the parties negotiations toward a final settlement agreement.
3. Settlement negotiations broke down unexpectedly on March 24, 2005.
4. For this reason, the Plaintiff is seeking this extension so that the parties may continue to discuss settlement, and if negotiations should breakdown

irretrievably, so that the Plaintiff may provide a timely opposition to the Defendant's Motion to Dismiss.

5. Plaintiff's counsel has contacted counsel for the Defendant, Richard Marcus, who represents that he has no objection to the Plaintiff's Motion to Extend the Filing Deadline.

Wherefore, the Plaintiff respectfully requests that the deadline for opposing the Defendant's Motion to Dismiss be extended until April 29, 2005.

Respectfully submitted,  
UNITED STEELWORKERS OF AMERICA,  
By their attorneys,

s/ Nicole Horberg Decter  
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Dated: March 24, 2005